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Counsel for Defendant Groupon, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LAS VEGAS SKYDIVING
ADVENTURES, LLC,

Plaintiff,

v.

GROUPON, INC.,

Defendant.

Case No.: 2:18-cv-02342-APG-VCF

**DECLARATION OF TYLER R.
ANDREWS IN SUPPORT OF
DEFENDANT GROUPON, INC.'S
EMERGENCY MOTION FOR
PROTECTIVE ORDER AND TO EXTEND
DISCOVERY DEADLINES BASED ON
COVID-19 PANDEMIC**

I, Tyler R. Andrews, declare as follows:

1. I am a shareholder with the law firm of Greenberg Traurig, LLP, attorneys for Defendant Groupon, Inc. ("Groupon"), licensed to practice in Nevada and California.

2. I am over the age of eighteen and competent to make this declaration. I make this declaration based on my personal knowledge and in support of Groupon's motion for protective order and to extend discovery deadlines based on the COVID-19 pandemic.

3. I have personal knowledge of the facts stated in this declaration, and could testify thereto if called upon to do so.

4. A dispute has arisen between the parties that is emergency in nature due to various upcoming discovery deadlines and general uncertainty due to the COVID-19 pandemic.

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1 5. The telephone number and address of my office is in the caption of this document.
2 The telephone number and address of Plaintiff's counsel is:

3 Gibson Lowry (Steve Gibson and Kristina Milotovic)
4 7495 West Azure Drive, Suite 233
5 Las Vegas, Nevada 89130
6 Main: (702) 541-7888

7 6. On Wednesday, March 18, I met and conferred with Plaintiff's counsel about
8 various issues in this case. Specifically, we discussed the propriety of certain depositions, the
9 interim status report, and how to best deal with discovery in light of the COVID-19 pandemic
10 given that discovery is set to close on May 15, 2020. The parties agreed that some sort of extension
11 was necessary.

12 7. Following the meet-and-confer, I spoke with my client about extending discovery
13 and on Friday, March 22, I proposed a three-month extension of all discovery dates, as outlined in
14 the motion. The general idea behind this proposal was that all existing deadlines be moved three
15 months.

16 8. The parties continued to confer via email but, while each side is in agreement that
17 some extension is necessary, could not reach an agreement regarding the parameters of an
18 extension.

19 9. Despite a sincere effort to resolve the dispute during meet-and-confer efforts, the
20 parties were unable to resolve the dispute without court intervention.

21 10. On March 23, 2020, before filing this motion, I notified Plaintiff's counsel that I
22 would be filing this motion.

23 11. I declare under penalty of perjury under the laws of Nevada and the United States
24 that the foregoing is true and correct.

25 DATED this 23rd day of March, 2020.

GREENBERG TRAURIG, LLP

26 /s/ Tyler R. Andrews
27 Tyler R. Andrews, Esq.